

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JIMMY TORRES

Plaintiff,

vs.

**THRIFTY RENT-A-CAR SYSTEM,
INC., ET AL,**

Defendants.

Civil Action No.

5:12-cv-01108-LS

REQUEST TO ENTER DEFAULT

Kindly enter the default of Cross Claim Defendant, National Bureau Collection Corporation, for failure to plead or otherwise defend as provided by Federal Rule of Civil Procedure 55(a), as appears from the Affidavit of Ronald M. Metcho, Esquire, attached hereto.

**MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN, P.C.**

By: 

RONALD M. METCHO, ESQUIRE
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Attorneys for Defendants and Cross Claim
Plaintiffs, Thrifty Rent-A-Car, Inc. and
Ride Share Systems, LLC

Dated: January 2, 2013

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JIMMY TORRES

Plaintiff,

vs.

**THRIFTY RENT-A-CAR SYSTEM,
INC., ET AL,**

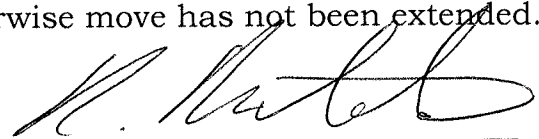
Defendants.

Civil Action No.

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AFFIDAVIT FOR ENTRY OF DEFAULT BY CLERK

I, Ronald M. Metcho, being duly sworn, depose and state that I am the attorney for Defendants and Cross Claim Plaintiffs, Thrifty Rent-A-Car, Inc. and Ride Share Systems, LLC in the above captioned matter; that Thrifty Rent-A-Car, Inc. and Ride Share Systems, LLC's Answer with Cross Claim in this action was served on counsel for Cross Claim Defendant, National Bureau Collection Corporation by certified mail, postage prepaid, on October 25, 2012, as confirmed by the Affidavit of Service attached hereto; that the time within which Cross Claim Defendant, National Bureau Collection Corporation, may answer or otherwise move as to the Cross Claim has expired; that Cross Claim Defendant, National Bureau Collection Corporation has not answered or otherwise moved and that time for Cross Claim Defendant, National Bureau Collection Corporation, to answer or otherwise move has not been extended.

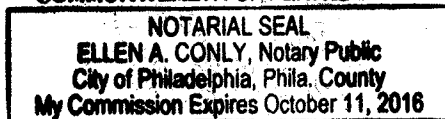


RONALD M. METCHO

Sworn to and subscribed before me
this 2nd day of January, 2013


Notary Public

COMMONWEALTH OF PENNSYLVANIA



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CERTIFICATE OF SERVICE

I, Ronald M. Metcho, Esquire, certify that a true and correct copy of the foregoing Request for Default was served on the below listed counsel by ECF and first class mail, postage pre-paid on January 2, 2013;

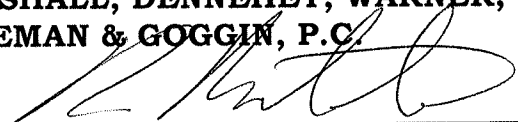
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National Bureau Collection Corporation

**MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN, P.C.**

By:


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Attorneys for Defendants and Cross Claim
Plaintiffs, Thrifty Rent-A-Car, Inc. and
Ride Share Systems, LLC